



deposit, which revenue allegedly was transferred from the Stanford Entities to Defendant. Plaintiff alleges that Defendant provided no value to the Stanford Entities in return for these payments. Plaintiff seeks disgorgement of these payments from Defendant that Plaintiff alleges were fraudulently transferred from the Stanford Entities to Defendant. Plaintiff alternatively alleges that it is entitled to disgorgement of these payments under the Doctrine of Unjust Enrichment.

Defendant denies the allegations of Plaintiff. Defendant asserts that any payments from the Stanford Entities to Defendant were made for reasonably equivalent value, in good faith, and without knowledge of the voidability of any transfer, as the payments were made in connection with Defendant's representation of the Stanford Entities. Defendant asserts that it represented the Stanford Entities, and not Allen Stanford, in the matters for which the Stanford Entities paid Defendant approximately \$580,000; that the Stanford Entities benefitted from the legal services provided by Defendant; that Defendant acted in good faith in receiving these payments; and that Defendant has a bona fide and legitimate claim to such payments. Defendant asserts that all compensation paid to it by the Stanford Entities was fair and reasonable, justly earned, and comparable to compensation for similar labor in the relevant industry. Defendant further asserts that some or all of Plaintiff's claims are barred by the statute of limitations.

b. Status of settlement discussions:

The parties have discussed the possibility of settlement but have concluded that substantive settlement discussions are premature at this time.

c. Possible joinder of additional parties:

None.

d. Any anticipated challenges to jurisdiction or venue:

**None.**

e. Date by which the case will be ready for trial and estimated length of trial:

**August 12, 2013. Estimated length of trial is two to three days.**

f. Desirability of ADR, and timing for ADR:

**The parties may consider ADR after completing discovery.**

g. Any objections to disclosure under Rule 26(a)(1):

**None at this time.**

2. Status of the Rule 26(f) Conference:

**The parties conducted the Rule 26(f) conference telephonically on August 6, 2012 through their counsel. This Joint Status Report is filed in conformity with Rule 26 and in compliance with the Court's Order of July 23, 2012.**

Respectfully submitted,

CASTILLO SNYDER, P.C.

By: /s/ Edward C. Snyder

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**CERTIFICATE OF SERVICE**

This pleading, Joint Status Report, was served in compliance with the Federal Rules of Civil Procedure by Electronic Service and/or certified mail/return receipt requested, on August 15, 2012:

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